

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE EASTERN DISTRICT OF VIRGINIA
4

RICHMOND DIVISION

5 ROBERT DAVID STEELE, et al.,

Case No.: 3:17-cv-00601-MHL

6 Plaintiff,

7 vs.

DEFENDANT'S AMENDED DISCLOSURE
8 STATEMENT

9 JASON GOODMAN, et al.,

10 Defendant

11 DEFENDANT'S AMENDED DISCLOSURE STATEMENT
12

13 Comes now, Defendant Jason Goodman, Pro Se, pursuant to Federal Rule of Civil
14 Procedure 26(a)(1) and FRCP rule 7.1 to submit his disclosures as follows. Defendant reserves
15 the right to supplement his disclosure statement as continuing investigation and discovery may
16 alter this disclosure and/or identify other potential witnesses, documents, and information.
17

1. Individuals likely to have discoverable material

- a. Robert David Steele (knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers) c/o Steven S. Biss (VSB No. 32972) E-mail: stevenbiss@earthlink.net 300 West Main Street, Suite 102 Charlottesville, Virginia 22903 Phone: (804) 501-8272 Fax: (202) 318-4098 Counsel for Plaintiffs
 - b. Representative of Earth Intelligence Network (knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers) c/o Steven S. Biss (VSB No. 32972) E-mail: stevenbiss@earthlink.net 300 West Main Street, Suite 102 Charlottesville, Virginia 22903 Phone: (804) 501-8272 Fax: (202) 318-4098 Counsel for Plaintiffs
 - c. Devin Nunes (associate of plaintiff knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers) 264 Clovis Avenue Suite 206 Clovis, CA 93612 Main: (559) 323-5235 Fax: (559) 323-5528
 - d. Jason Goodman (knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers) 252 7th Avenue Apt 6s New York NY 10001 Pro Se Defendant

- 1 e. Patricia A. Negron (knowledge regarding the allegations set forth in the
2 Complaint and the denials, defenses, and allegations set forth in the
3 Defendants' Answers) c/o R. Johan Conrod, Jr. (VSB No. 46765) E-mail:
4 rjconrod@kaufcan.com KAUFMAN & CANOLES, P.C. 150 West Main
5 Street, Suite 2100 Norfolk, VA 23510 Phone: (757) 624-3000 Fax: (888) 360-
6 9092 Terry C. Frank, Esq. (VSB No. 74890) E-mail: tcfrank@kaufcan.com
7 Benjamin A. Wills, Esq. (VSB No. 88109) E-mail: bawills@kaufcan.com
8 KAUFMAN & CANOLES, P.C. 1021 E. Cary Street, Suite 1400 Richmond,
9 Virginia 23219 Phone: (804) 771-5700 Fax: (888) 360-9092 Counsel for
10 Defendant Patricia A. Negron
- 11 f. Susan Holmes a/k/a Susan Lutzke a/k/a Queen Tut1 (knowledge regarding the
12 allegations set forth in the Complaint and the denials, defenses, and
13 allegations set forth in the Defendants' Answers) 1221 University Ave., Unit
14 D202 Fort Collins, CO 80521 Pro se Defendant
- 15 g. D. George Sweigert (potential knowledge regarding the online activities of the
16 parties related to the allegations set forth in the Amended Complaint and the
17 Defendants' Answers) c/o P.O. Box 152 Mesa, AZ 85211 Prospective Pro se
18 Intervenor
- 19 h. George Webb Sweigert (brother of D. George Sweigert with potential
20 knowledge regarding the online activities of the parties related to the
21 allegations set forth in the Amended Complaint and the Defendants' Answers)
22 Country Inn and Suites by Raddison 8850 Hampton Mall Dr N, Capitol
23 Heights, MD 20743 (503) 919-0748

- i. Dr. Cynthia Ann McKinney (knowledge of the allegations set forth in the Amended Complaint and the Defendants' Answers specifically with respect to the Plaintiffs' #UNRIG campaign, its operation, and donations thereto)
Address and number unknown.
 - j. Manuel Chavez III (Former Associate of Plaintiff and recent associate of D. George Sweigert with knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers). Address unknown (480) 332-9117
 - k. Tyroan Simpson (Former Associate of Plaintiff and recent associate of D. George Sweigert with knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers). Address and phone number unknown
 - l. Nathan Stolzman (Former Associate of Plaintiff and recent associate of D. George Sweigert with knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers). Address and phone number unknown
 - m. Jacquelyn Weaver (associate of D. George Sweigert with knowledge regarding the allegations set forth in the Complaint and the denials, defenses, and allegations set forth in the Defendants' Answers). 102 Fern Purvis, MS 39475 jacquelyn113@hotmail.com
 - n. Steve Outtrim (associate of D. George Sweigert and co-Defendant Lutzke with knowledge regarding the allegations set forth in the Complaint and the

1 denials, defenses, and allegations set forth in the Defendants' Answers). 90

2 Franklin Road Freemans Bay Auckland 1011 New Zealand

3 o. Kevin Marsden (associate of D. George Sweigert with knowledge regarding

4 the allegations set forth in the Complaint and the denials, defenses, and

5 allegations set forth in the Defendants' Answers).

6 p. Jake Morphonios (associate of D. George Sweigert and co-Defendant Lutzke

7 with knowledge regarding the allegations set forth in the Complaint and the

8 denials, defenses, and allegations set forth in the Defendants' Answers).

9 morphonios@yahoo.com

10 q. Dean Fougere (associate of D. George Sweigert with knowledge regarding the

11 allegations set forth in the Complaint and the denials, defenses, and

12 allegations set forth in the Defendants' Answers) 154 Lake Drive Plymouth

13 MA 02360 (508) 329-2046

14 r. Quinn Michaels (AKA Corey Aiken)(former associate of Defendant Goodman

15 with knowledge regarding the allegations set forth in the Complaint and the

16 denials, defenses, and allegations set forth in the Defendants' Answers)

17 address unknow phone number (503) 395-xxxx

18 s. Steven S. Biss (council for Plaintiff and participant in alleged conspiracy to

19 bring frivolous lawsuits against Defendant, with knowledge regarding the

20 allegations set forth in the Complaint and the denials, defenses, and

21 allegations set forth in the Defendants' Answers and motion to disqualify) 300

22 West Main Street, Suite 102 Charlottesville Virginia 22903 (804) 501-8272

1 t. Tanya Cornwell (wife and paralegal of Steven S Biss and participant in
2 alleged conspiracy to bring frivolous lawsuits against Defendant, with
3 knowledge regarding the allegations set forth in the Complaint and the
4 denials, defenses, and allegations set forth in the Defendants' Answers and
5 motion to disqualify) 300 West Main Street, Suite 102 Charlottesville Virginia
6 22903 (804) 501-8272

7

8 2. Documents

9 The Defendant intends to use the following documents in support of his case

- 10
- 11 a. All documents identified and referred to in the parties' pleadings, including
12 documents that are linked via internet URLs
- 13 b. All documents produced in discovery by the parties;
- 14 c. E-mails exchanged between Defendant Goodman and Plaintiff
- 15 d. E-mails exchanged between Defendant Goodman and Co-Defendant Negron.
- 16 e. E-mails exchanged between Defendant Goodman and Co-Defendant Lutzke
- 17 f. E-mails and telephone calls between Defendant Goodman and Counsel for
18 Plaintiff
- 19
- 20 g. E-mails and telephone calls between Defendant Goodman and William F.
21 Kernan
- 22
- 23 h. E-mails provided by Manuel Chavez III between Chavez and Biss, Chavez
24 and Cornwell, Chavez and Plaintiff as well as other parties contained in the
25 emails.
- 26 i. All documents produced by third-parties in response to Rule 45 Subpoenas.

27

28 3. Damages

1 Defendant Goodman is not claiming any damages at this time but reserves his right to
2 amend that in the future.

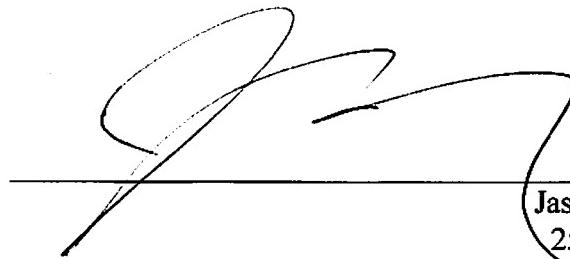
3 4. Insurance

4 There is no applicable insurance.

5
6 Defendant reserves the right to amend and supplement these Rule 26(a)(1) Disclosures in
7 accordance with the Rule 26 FRCP.

8
9 DATED: Jan 20, 2020

10 Respectfully submitted,

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18 Jason Goodman, Pro Se
19 252 7th Avenue Apt 6s
20 New York, NY 10001
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27
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truth@crowdsourcethetruth.org

Circuit Court for Eastern Division Virginia

Case No. 3:17-cv-601-MHL

Robert David Steele and Earth Intelligence Network

City or County

Name				
11005 LANGTON ARMS CT				
Street Address	Apt #			
OAKTON,	VA	22124	(571)	320-8573
City	State	Zip Code	Area Code	Telephone

Plaintiff

VS.				
Jason Goodman				
Name	6s			
252 7th avenue				
Street Address	Apt #			
New York	NY	10001	(323)	744-7594
City	State	Zip Code	Area Code	Telephone

Defendant

CERTIFICATE OF SERVICE

(DOMREL58)

I HEREBY CERTIFY that on this 20 day of January, 2020, a copy
of the document(s) entitled DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE

Title of Document(s)
was/were mailed, postage prepaid to:

Terry Frank

Opposing Party or His/Her Attorney

1021 E. Cary Street, 14th Floor

Address

Richmond
City

VA
State

23219
Zip

January 20 2020
Date

Signature



Circuit Court for Eastern Division Virginia
City or County

Case No. 3:17-cv-601-MHL

Robert David Steele and Earth Intelligence Network

Name 11005 LANGTON ARMS CT	Street Address OAKTON, VA 22124	Apt.# (571) 320-8573		
City Plaintiff	State VA	Zip Code 22124	Area Code (571)	Telephone 320-8573

VS.

Name Jason Goodman	Street Address 252 7th avenue New York	Apt.# 6s (323) 744-7594		
City Defendant	State NY	Zip Code 10001	Area Code (323)	Telephone 744-7594

CERTIFICATE OF SERVICE
(DOMREL58)

I HEREBY CERTIFY that on this 20th day of January, 2020, a copy of the document(s) entitled DEFENDANT'S RESPONSE IN OPPOSITION TO PLAINTIFF'S MOTION IN LIMINE

Title of Document(s)
was/were mailed, postage prepaid to:

Steven S Biss

Opposing Party or His/Her Attorney

300 West Main Street Suite 102

Address

Charlottesville VA 22903
City State Zip

January 20 2020
Date

Signature



**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

ROBERT DAVID STEELE, et al.,

Plaintiff(s),

v.

Civil Action Number: 3:17-cv-00601-MHL

JASON GOODMAN, et al.,

Defendant(s).

LOCAL RULE 83.1(M) CERTIFICATION

I declare under penalty of perjury that:

DEFENDANT'S RESPONSE IN OPPOSITION

TO PLAINTIFF'S MOTION IN LIMINE

Jason Goodman (Print or Type)

Signature of Pro Se Party

Executed on: January 20, 2020 (Date)

OR

The following attorney(s) prepared or assisted me in preparation of _____.
(Title of Document)

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

Prepared, or assisted in the preparation of, this document

(Name of Pro Se Party (Print or Type))

Signature of *Pro Se* Party

Executed on: _____ (Date)

1 IN THE UNITED STATES DISTRICT COURT
2

3 FOR THE EASTERN DISTRICT OF VIRGINIA
4

5 ROBERT DAVID STEELE, et al., Case No.: 3:17-cv-00601-MHL
6 Plaintiff,
7 vs.
8 JASON GOODMAN, et al.,
9 Defendant

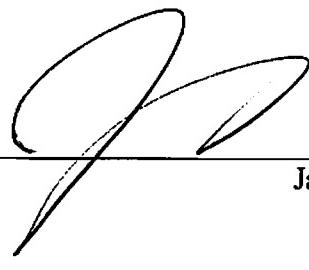
DEFENDANT'S SWORN STATEMENT

DEFENDANT'S SWORN STATEMENT

I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

Further, I hereby attest that the attached exhibits are accurate and true copies of source documents as described. Video and telephone recording transcripts may contain typos due to voice to text transcription software. True and accurate copies of original video and audio recordings can be provided should it please the court.

Signed this 20th day of January 2020



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23
24 Jason Goodman, Defendant, Pro Se
25 252 7th Avenue Apt 6s
26 New York, NY 10001
27 (323) 744-7594
28 truth@crowdsourcethetruth.org